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VIA AIRBORNE EXPRESS

Mr. Charles Medalen
Office of Chief Counsel
FHWA Docket No. MC-93-12
Room 4232, HCC-10
Federal Highway Administration
400 Seventh Street SW,
Washington, DC 20590

FHWA-97-2199-50

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RE: MOTOR CARRIER ACT OF 1991, SEC. 4007

Dear Mr. Medalen:

This letter is being submitted to you pursuant to the Federal Highway Administration's (FHWA) published request for comments published at Vol. 58, No. 117 of the Federal Register on training standards for all entry level drivers of commercial motor vehicles (CMV's).

I have been Director of Driver Training at Schneider National, Inc. ("Schneider") for over 6 years, during which time the company has hired and trained thousands of drivers. I currently oversee three company training centers, which employ seven managers and over 100 instructors.

Schneider is the largest irregular route trucking organization in the country. Revenues last year exceeded \$1 billion. Unlike the large general commodities carriers, (such as Roadway), Schneider relies heavily on less experienced drivers who are trained at our company facilities. We are proud of our driver training programs. They are comprehensive, detailed and successful.

There are several reasons why we believe that federally mandated training standards are unnecessary.

First, FHWA's stated goal is to ensure that all CMV drivers demonstrate the minimum levels of knowledge and skill needed to safely operate CMV's. It is this public safety goal and not the method of achieving this goal which should be the object of FHWA's focus. We therefore believe that the public interest would be better served by focusing on testing, rather than "training standards". Training standards may or may not create a safe driver. That's why we believe the current method of qualifying drivers for a commercial driver license (CDL), which is based on the driver's demonstrated skills, better achieves FHWA's stated goal. If FHWA therefore concentrates on improving the CDL test requirements, FHWA will not only be taking aim at the proper target, but also will be focusing on the best method by which to produce safer drivers and safer roads.

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Second, training standards unduly restrict a company's ability to train drivers individually rather than generically. Each student has individual abilities and a concurrent rate of learning. To teach to the generic average undertrains some and overtrains others. Skill based training, like at Schneider, allows each student to progress at his or her own pace. In fact, letting some students progress at a faster pace has the added benefit of teaching advanced skills at an earlier stage. Training standards would merely hold such students back. For those students who require more time, Schneider's program is designed to accommodate that need, whereas uncompromising training standards would not.

Third, employers who train their own drivers have a natural incentive to train drivers to a high standard. Training and retaining skilled and safe drivers is simply in the company's best interests. We believe artificial "time" or "hour" requirements contained in training standards would not be as effective in training safe drivers as are skill-based formats.

Fourth, given the diversity of trucking operations, it is impossible to develop uniform training standards that meet everyone's needs. For example, some companies carry hazardous materials, which may require specialized training in that area, while other companies require training for more broad-based skills. In other words, the particular operation dictates the particular training need, and therefore mandated subjects or standards not relevant to the particular operation create not only inefficiency, but also detract from the goal to ensure safe drivers for that operation.

Fifth, public and private training schools already meet the standards of their various accrediting agencies, and ultimately their students must meet the standards of the CDL test. These mechanisms are already in place, and therefore further regulation would be not only superfluous, but also burdensome.

To sum up, federally-mandated training standards, although well intentioned, create inefficiencies which far outweigh any added benefit. Trucking today is highly competitive on the local, national and international levels. Indeed, with the possible passage of the North American Free Trade Agreement (NAFTA), currently before Congress, it is essential to maintain the stability and profitability of American companies without burdening them with further regulation. This is particularly true when current licensing methods, although imperfect, already achieve FHWA'S goal.

I would now like to respond to the specific questions enumerated in the Federal Register.

1. Mechanisms already exist to test new drivers and to make the testing agencies accountable for the results. The CDL is administered by the states or by qualified third parties, and each company is required by law to have on file a qualification road test along with other proof of qualification for each driver employed.
2. As stated earlier, employers are already responsible for the performance of their drivers, and schools must account to their accrediting agencies to produce qualified drivers to pass the CDL.
3. Minimum requirements must be specific to each vehicle configuration (combinations, air brakes, trailer types, etc.). Moreover, each operation (local, long-haul, intermodal, construction, etc.) is different and dictates different requirements. Minimum time is not appropriate. For example, Schneider's regulatory training varies from 5 to 6.5 hours per week, depending on how well the individuals are learning the material.
4. Training standards are not the best vehicle through which to create safe drivers. Skill-based standards, such as the requirements to qualify for the CDL, and/or to pass a company road test, already exist and better judge whether drivers have learned the proper skills.
5. The CDL standards, in combination with employer road test standards, are more than sufficient. In fact, at Schneider we also teach coupling, uncoupling, and injury prevention along with road skills. Between the two, basic skills are adequately covered and safe drivers are produced.
6. For all the reasons already stated, Schneider is opposed to federally mandated training standards.
7. An "entry level CMV driver" at Schneider has successfully completed initial training, has received his or her CDL, and has spent 2 weeks of practical application with a training engineer. A training engineer does not sleep while the student drives. The engineer limits his or her own driving for demonstration purposes to less than 25% of the miles driven during training. Trainees are later teamed with another driver for the next 4-6 weeks.
8. The CDL test and employer qualification road tests ensure that skills are in place.

9. Although we do not know the actual number of schools and company programs, it is Schneider's belief that many drivers are trained through schools and company programs. Again, the fact that CDL licensing is a requirement ensures safe drivers.
10. Drivers employed by Schneider who have not yet logged at least 30,000 miles are divided into two categories. The first group consists of drivers who have attended a driving school and have a CDL. They are trained for one week (3 days classroom and 4 days over the road). Upon passing the company road test, they spend a minimum of two weeks with a training engineer, as described above.

The second group consists of drivers with no experience or CDL. They attend a basic course for a minimum of two weeks and must pass both the CDL test and the company road test before moving on to the training engineer stage.
11. Again, CDL standards, school accreditation standards, and company programs ensure safe drivers.
12.
 - a. N/A
 - b. N/A
 - c. Schneider's formal training program results in an average cost to Schneider of over \$3000 per student.
 - d. N/A
13. Schneider has an on-going program of driver training to ensure up-to-date skills. First, Schneider requires annual recertification in hazardous materials and brake adjustment. Second, training is offered in logging, backing, defensive driving, slow maneuvering (corners, etc.), injury prevention, trip planning, and efficient driving (MPG). Third, Schneider uses regular skid pad training. Fourth, experienced drivers may also apply for and be trained in positions as recruiters, training engineers, and school instructors. Finally, those who handle special freight are required to complete extra training. For example, those in specialized carriers (flatbed trailers) complete 7 days of classroom instruction and hands-on instruction. Those in bulk carriers (tankers) complete 6 days of classroom and hands-on instruction.

At Schneider, we personalize our training to achieve specific skills rather than sanitizing it for a "one size fits all" program. Artificial training standards, no matter how well

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intentioned, are costly, inefficient, generic, and simply not the best way to ensure skilled and safe drivers. Schneider's drivers are the real examples of the effectiveness of Schneider's approach. Indeed, Schneider's safety record and success speaks for itself. We therefore believe, "If it ain't broke, don't fix it."

Should you need any additional information or want to discuss this matter further, please feel free to contact me.

Sincerely,



James F. Jeray
Schneider National, Inc.
Director of Driver Training

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